

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER )  
of the NEW ENGLAND TEAMSTERS AND )  
TRUCKING INDUSTRY PENSION FUND )

Plaintiff, )

v. )

PYTKO CONSTRUCTION CORP. )

Defendant, )  
\_\_\_\_\_ )

C.A. No. 04cv12001NMG

MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR SUMMARY JUDGMENT

Now comes the Plaintiff and requests an extension of time to file a Motion for Summary Judgment from July 15, 2005 to July 22, 2005. This action is for collection of delinquent contributions to an ERISA employee benefit fund, and Defendant has proposed a payment schedule. Additional time is necessary to coordinate a potential settlement of this matter.

Dated: July 15, 2005

Respectfully submitted,

Catherine M. Campbell  
BBO #549397629444  
Feinberg, Campbell & Zack, P.C.  
177 Milk Street  
Boston, MA 02109  
(617) 338-1976

/s/ Catherine M. Campbell  
Attorney for Plaintiff

Certificate of Service

I, Catherine M. Campbell, hereby certify that I caused a copy of the foregoing to be mailed this day by U.S. first-class mail to Roger Leboeuf, Healdon Association, 58 Weybosset St., Suite 606, Providence, RI 02903.

Date: July 15, 2005

/s/Catherine M. Campbell  
Catherine M. Campbell

EXHIBIT 